

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA, )  
Plaintiff, ) 17-cr-64-DWF-KMM  
v. )  
EDWARD S. ADAMS, ) **CONSENT MOTION FOR  
Defendant. ) EXTENSION OF TIME TO FILE  
                                  ) POSITION REGARDING  
                                  ) SENTENCING  
                                  )**  
                                  )

Mr. Edward S. Adams, through undersigned counsel, respectfully moves for a six-day extension of time to file his Position Regarding Sentencing, to and including January 9, 2020. Absent an extension, Mr. Adams's brief would be due on January 3, 2020.

1. Mr. Adams has filed no prior motion for an extension of time as to his Position Regarding Sentencing.

2. Mr. Adams requests an extension of time because multiple holidays fall between now and the current deadline for Mr. Adams's brief, and multiple members of Mr. Adams's legal team have religious and other commitments in connection with those holidays.

3. The proposed extension will allow Mr. Adams adequate time to prepare his Position Regarding Sentencing, and will not interfere with any other deadlines or hearings this Court has set.

4. Counsel for Mr. Adams has consulted with counsel for the government, who does not oppose the proposed extension of time.

Dated: December 20, 2019

Respectfully submitted,

/s/ Lance Wade

Joseph G. Petrosinelli (DC Bar #434280)  
Lance Wade (DC Bar #484845)  
Gloria Maier (DC Bar # 1012208)  
Jena Neuscheler (DC Bar # 187814)  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
Telephone: (202) 434-5000  
jpetrosinelli@wc.com  
lwade@wc.com  
gmaier@wc.com  
jneuscheler@wc.com

James L. Volling (#113128)  
Deborah A. Ellingboe (#26216X)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55420  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600  
james.volling@faegrebd.com  
debbie.ellingboe@faegrebd.com

*Attorneys for Defendant Edward S. Adams*